
No. 15-5170

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SAFARI CLUB INTERNATIONAL, *et al.*,
Plaintiffs-Appellants

v.

SALLY JEWELL, in her official capacity as
United States Secretary of the Interior, *et al.*,
Defendants-Appellees

On Appeal from the United States District Court for the District of Columbia
(No. 14-00670)

STATEMENT OF ISSUES BY APPELLANTS

Plaintiffs/Appellants, Safari Club International and National Rifle Association of America, present the following statement of issues in this case:

- Whether the District Court erred in dismissing SCI/NRA's three claims challenging the ban on the importation of elephants sport-hunted in Tanzania in 2014.
- Whether the District Court erred in concluding that the actions and findings at issue are not final agency action and are not the consummation of the U.S.

Fish and Wildlife Service's decision-making process, including for SCI/NRA members who were harmed by the ban but had no need or occasion to apply for an import permit.

- Whether the District Court erred in concluding that the exhaustion of the administrative process would not be futile, despite the fact that the U.S. Fish and Wildlife Service set up a nearly insurmountable hurdle to proving non-detriment and enhancement.

Dated: July 14, 2015

Respectfully submitted,

/s/ Anna M. Seidman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of July, 2015, a true and correct copy of Statement of Issues by Appellants was electronically filed through the CM/ECF system, which caused all parties to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

/s/ Anna M. Seidman
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